

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
Charleston Division**

**ALISHA KINGERY,
f/k/a ALISHA WILKES,
individually and on behalf of all
others similarly situated,**

Plaintiffs,

v.

Civil Action No. 2:12-cv-1353

QUICKEN LOANS, INC.,

Defendant.

CONSENT MOTION FOR AN EXTENSION OF TIME

Quicken Loans, Inc. (“Quicken Loans”), by counsel, with the consent of Plaintiff’s counsel, respectfully moves the Court for an extension of the time period within which to file motions to quash various subpoenas duces tecum that Plaintiff has issued to third parties in connection with this lawsuit.

Plaintiff has served three nearly identical subpoenas duces tecum on Equifax Information Services, LLC, Experian Information Solutions, Inc., and TransUnion, LLC. (*See* ECF Nos. 80, 81, and 82). Quicken Loans’ counsel has represented to Plaintiff that Quicken Loans may file a motion to quash each subpoena duces tecum on various grounds, if necessary. Under the Federal Rules of Civil Procedure, a motion to quash must be made in a “timely” fashion. *See* Fed R. Civ. P. 45(c)(3).

Plaintiff’s counsel has consented to Quicken Loans’ request for an extension of time until August 7, 2013 to file motions to quash the above-referenced subpoenas. Plaintiff’s counsel has stated, and Quicken Loans has acknowledged, that this agreed extension should not be

interpreted as an admission by Plaintiff that the motions to quash are valid or that Quicken Loans has standing to bring the same.

WHEREFORE, Quicken Loans, by counsel and with Plaintiff's consent, hereby requests that the Court enter the attached Consent Order: (1) granting Quicken Loans' Consent Motion for an Extension of Time; and (2) providing Quicken Loans with an extension of time to file motions to quash the above-referenced subpoenas duces tecum until on or before August 7, 2013.

Dated: July 31, 2013

Respectfully Submitted,

QUICKEN LOANS, INC.

By: /s/ John C. Lynch
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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